

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION

MDL NO. 2804

Case No. 17-MD-2804

THIS DOCUMENT RELATES TO:

Judge Dan Aaron Polster

*Jennifer Artz, et al. v. Endo Health Solutions Inc., et al.*, Case No. 1:19-OP-45459

*Michelle Frost v. Endo Health Solutions Inc., et al.*, Case No. 1:18-OP-46327

*Salmons v. Purdue Pharma L.P., et al.*, Case No. 1:18-OP-45268

**ASSERTIO THERAPEUTICS, INC. (f/k/a DEPOMED INC.)’S MOTION FOR LEAVE  
TO FILE UNDER SEAL ASSERTIO’S OPPOSITION TO NAS GUARDIANS’  
MOTION FOR CLASS CERTIFICATION AND ACCOMPANYING EXHIBITS**

Defendant Assertio Therapeutics, Inc. (f/k/a Depomed, Inc.) (“Assertio”) respectfully moves this Court for leave to file under seal unredacted versions of its Opposition to NAS Guardians’ Motion for Class Certification (the “Opposition”) and exhibits attached thereto (Docs. 3522 and 3522-1).

Prior to Assertio’s filing the Opposition and supporting exhibits, liaison counsel for Defendants contacted Special Master Cohen regarding the proper procedure for filing documents containing potentially confidential information, including Plaintiffs’ personal and medical information. Special Master Cohen directed Defendants to concurrently file redacted copies with the Court and email unredacted copies to the Special Master and Plaintiffs’ counsel, and then file unredacted copies under seal if Plaintiffs determined the medical information should remain confidential. Plaintiffs have reviewed Assertio’s Opposition and the exhibits attached thereto and